

CHEATSHEET FOR: ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

40 CFR 58.10(a) specifies the following monitors as being included in the ANP: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, PAMS stations, and SPM monitoring stations.

EPA R9 will withhold approval of all items that EPA HQ has approval authority. We will do a check to see if the information is included and correct. The items that have EPA HQ approval authority are: PAMS, NCore, Speciation (STN/CSN), and [NO2 requirements includeing near road, area-wide, and RA40].

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app? ¹
1.	Submit plan by July 1 st	58.10 (a)(1)		Request plan be submitted ASAP.	ANP approval can happen within 120 days of when delinquent plan is received	shall submit	N	N
2.	Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	No impact on current year's approval	Shall include	N	Y
3.	30-day public comment / inspection period ²	58.10 (a)(1),		Put out for comment and	EPA provide comment period	Shall/must provide	N	Y

Comment [mk1]: Move this footnote to description of regulation.

¹ This identifies critical criteria for approval (i.e., partial disapproval if requirement is not met). All other network plan information is WOE.

Critical is based on:

- 40 CFR 58.10 says “must include” or “shall provide”
- 40 CFR 58, App A – pick the critical ones and all else WOE
- 40 CFR 58, App C – ID as critical if requirement is “must”
- 40 CFR 58, App D – ID as critical if requirement is “must”
- 40 CFR 58, App E – none are critical since these need to be followed “to the extent possible”

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
		58.10 (a)(2)		resubmit				
4.	Modifications to SLAMS network – case when we are not approving actual system modifications (i.e., we will do it outside the ANP process)	58.10 (a)(2)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y
5.	Modifications to SLAMS network – case when we are approving actual system modifications	58.10 (a)(2)		Add/correct in following year's plan or letter and withhold approval of that portion	If 58.14(c) has not been met then withhold approval of system modification but can approve that the plan included the list of modifications	Subject to approval by RA	N	Y
6.	Does plan include documentation for system modifications that have been approved since last ANP approval?			Add/correct in next year's plan.	N/A – req. met if correct info submitted	No formal requirement but OGC request	Y	N
7.	NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	Shall HQ app.	N	N
8.	NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that	Withhold approval of that portion	Plan shall provide for ... HQ app.	N	Y

² Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
				portion				
9.	Pb plan for ≥ 1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion	If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
10.	Pb site for ≥ 1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion	Plan shall provide for ...	Y	Y
11.	Pb plan for 0.5-1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP	If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
12.	Pb site for 0.5-1.0 tpy sources operational by 12/27/2011	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion	Plan shall provide for ...	Y	Y
13.	NO ₂ plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion	2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
14.	NO ₂ area-wide and	58.10		Add/correct in	Withhold	Plan shall	Y –	Y –

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
	RA40 sites operational by 1/1/2013	(a)(5)		following year's plan and withhold approval of that portion	approval of that portion	provide for ...	starting in 2013 ANPs	starting in 2013 ANPs
15.	NO2 plan for near-road sites by 7/1/2012	58.10 (a)(5)		Ask for plan ASAP (public comment period required)	2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
16.	NO2 near-road sites operational by ? (N/A until 2013 or 2014 plans)	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion ?	Plan shall provide for ...	Y – starting in 2013 or 2014 ANPs (dep on rule change)	Y – starting in 2013 or 2014 ANPs (dep on rule change)
17.	SO2 plan for PWEI sites by 2011	58.10 (a)(6)		Ask for plan ASAP (public comment period required)	If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
18.	SO2 sites operational by 1/1/2013	58.10 (a)(6) and 58.13(d)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion	Plan shall provide for...	Y	Y
19.	CO plan for 2015 near-road sites by 7/1/2014	58.10 (a)(7) and 58.13(e)(1)		Ask for plan ASAP (public comment period required)	If the submitted plan does not meet the requirements:	Shall	N	Y – starting in 2014 ANPs

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
					withhold approval of that portion			
20.	CO sites for first phase of CO monitors operational by 1/1/2015	58.10 (a)(7) and 58.13(e)(1)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion	Plan shall provide for...	Y – starting in 2015 ANPs	Y – starting in 2015 ANPs
21.	CO plan for 2017 near-road sites by 7/1/2016	58.10 (a)(7) and 58.13(e)(2)		Ask for plan ASAP (public comment period required)	If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y – starting in 2016 ANPs
22.	CO sites for first phase of CO monitors operational by 1/1/2017	58.10 (a)(7) and 58.13(e)(2)		Add/correct in following year's plan and withhold approval of that portion	Withhold approval of that portion	Plan shall provide for...	Y – starting in 2017 ANPs	Y – starting in 2017 ANPs
23.	AQS site identification number for each site	58.10 (b)(1)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	N	Y
24.	Location of each site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	N	Y

Comment [g2]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
25.	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	N	Y
26.	Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion	If operating schedule does not meet req: withhold approval of that portion (can be monitor specific)	Must contain following information	Y	Y
27.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y
28.	Monitoring objectives ³ for each monitor as defined in Appendix D	58.10(b)(6) ; App. D		Add/correct in following year's plan and withhold approval of that portion	If all three monitoring obj. are not identified somewhere in ANP: withhold approval of that portion.	Must contain following information	N – reconsider if non-NAAQS objectives can be non-reg	Y
29.	Scale of representativeness for each monitor as defined in Appendix D			Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y

³ Site type is considered later.

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
30.	Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y
31.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	N	Y
32.	The designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y
33.	Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y
34.	Any Pb monitor for which a waiver has been requested or granted by EPA RA for use of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)		Add/correct in following year's plan and withhold approval of that portion	N/A – req. met if correct info submitted	Must contain following information	Y	Y
35.	Identification of required NO2 monitors as either near-road or area-wide	58.10 (b)(12)		Add/correct in following year's plan and withhold	Withhold approval of that portion	Must contain following information	Y	Y

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				approval of that portion				
36.	Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor. ⁴	58.10 (c)		Add/correct in following year's plan and withhold approval of that portion	If the process for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.	must	N	Y
37.	Plan to modify the network that complies with findings of the 5-year network assessment. [Note: recommended to be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)		Add/correct in following year's plan and withhold approval of that portion	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N
38.	All additions and discontinuations of SLAMS have been subject to approval according to 58.14	58.10 (e)		Withhold approval of that portion. Work separately with agency to obtain information needed to approve modification and approve outside ANP process. List in following	If modification does not meet req: withhold approval of that portion.		Y for some sites: DV, high conc, co-located, etc.	Y

⁴ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
				year's plan.				
39.	Precision/Accuracy reports submitted to AQS	App. A		Add/correct in following year's plan.	N/A – req. met if correct info submitted	Must => WOE	N	N
40.	Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted	Must => WOE	Y	Y
41.	Frequency of flow rate verification for manual PM samplers audit	App A, 3.3.2		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
42.	Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
43.	Frequency of one-point flow rate verification for Pb samplers audit	App A, 3.3.4.1		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
44.	Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
45.	Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
46.	Dates of last two semi-annual flow rate audits for PM monitors	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
47.	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1		Add/correct in following year's plan.	If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
48.	PM2.5 co-location met?			Add/correct in following year's plan and withhold approval of that portion.	If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
49.	Manual PM10 method co-location met? (note: continuous PM10 does not have this requirement)	App. A 3.3.1	15% for each "network of manual PM10 methods	Add/correct in following year's plan and withhold approval of that portion.	If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
50.	Pb co-location met?	App. A 3.3.4.3	1 st collocated site must be at highest site in the network (unless RA grants a waiver). Collo	Add/correct in following year's plan and withhold	If co-location does not meet requirement then withhold	Must => WOE	Y	Y

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
			samples at minimum 1:12. a) If have more than just Pb at NCore, must collocate at 15% of sites (at least one). b) If network only has Pb at NCore, part of national collocation network. Collocated monitors must be same method as primary.	approval of that portion.	approval of that portion.			
51.	PM10-2.5 co-location met? (note: only applies to Fresno and Phoenix NCore sites)	App. A 3.3.6		Add/correct in following year's plan.	N/A – HQ req.	Must => WOE	N	N
52.	PM2.5 PEP audits	App. A (3.2.7)		Check EPA records.	EPA adjusts schedule	EPA req.	Y	N
53.	Pb PEP audits	App. A (3.3.4.4)		Check EPA records.	EPA adjusts schedule	EPA req.	Y	N
54.	NPAP audit	App. A (2.4)		Check EPA records.	EPA adjusts schedule	EPA req.	Y	N
55.	Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted	must	Y	Y
56.	Placeholder for: Optional request to have PM2.5 continuous instruments treated as non-FEMs and therefore not comparable to NAAQS?	Proposed rule and memo		Assume all FEM instruments are comparable to NAAQS (see previous item)	If the evidence to treat FEMs as non-FEMs is not compelling: withhold approval of that		Y – starts in 2013 ANP?	Y if request is included – starts in 2013 ANP?

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
					portion and treat all FEMs as regulatory monitors			
57.	Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
58.	Instrument monitor type for each monitor			Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted		Y – ID non-reg. monitors	Y
59.	Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted	Must	N	Y
60.	Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that portion.	N/A – req. met if correct info submitted		N	Y
61.	Instrument parameter code for each instrument			Add/correct in following year's plan and withhold approval of that	N/A – req. met if correct info submitted		Y	Y

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
				portion.				
62.	Instrument parameter occurrence code for each instrument			Add/correct in following year's plan.	N/A – req. met if correct info submitted		N	N
63.	Sampling season (note: date of waiver approval must be included if the sampling season deviates from requirement)	App. D		Add/correct in following year's plan and withhold approval of that portion.	If sampling season does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
64.	Sampling schedule for PM _{2.5}	58.12(d)	-1:3 (must at NCore and required reg background and reg transport sites) -Waiver for 1:6 at required SLAMS if data is not 5-10% away from either NAAQS and not 1 or more exceedances for prev 3 years AND cont. monitor also operating at site -Daily if DV site and 5% of 24-hr NAAQS -Speciation at STN must be 1:3	Add/correct in following year's plan and withhold approval of that portion.	If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
65.	Sampling schedule for PM ₁₀	58.12(e)		Add/correct in following year's plan and withhold approval of that	If sampling schedule does not meet requirements or a deviation has not	must	Y	Y

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
				portion.	been approved: withhold approval of that portion			
66.	Sampling schedule for Pb	58.12(b)		Add/correct in following year's plan and withhold approval of that portion.	If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	Y	Y
67.	Sampling schedule for PM10-2.5	58.12(f)	-1:3 (must at NCore if no continuous PM10-2.5 FEMs) -PM10-2.5 speciation at NCore must operate 1:3	Add/correct in following year's plan and withhold approval of that portion.	If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:3	N	Y
68.	Minimum monitoring requirements ⁵ met for O3	App. D		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
69.	Minimum monitoring requirements met for NO2	App. D		Add/correct in following year's plan and	If minimum monitoring requirements are	must	Y	Y

⁵ Describe what has to be included (i.e., MSA, population, etc.).

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				withhold approval of that portion.	not met: withhold approval of that portion			
70.	Minimum monitoring requirements met for SO ₂	App. D section 4.4	Must be: a) within CBSA boundary and be site type of: pop exposure, highest conc, source impacts, bkgd, or transport; or b) Can be outside CBSA if assesses the highest concentration for significant sources/source categories existing within CBSA. May be micro, middle, or neighborhood scale for max concentrations; may be urban scale for trends/ transport/ background.	Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
71.	Minimum monitoring requirements met for CO	App. D		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y – starting in 2015 ANP	Y – starting in 2015 ANP
72.	Minimum monitoring requirements met for Pb	App. D section 4.5; 58.13(a)	non airport sources >= 0.5 tpy; airports >= 1 tpy; at max	Add/correct in following year's plan and	If minimum monitoring requirements are	must	Y	Y

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
			concentration site taking into account logistics and population exposure; most appropriate scale = micro or middle), including for Pb at NCore (CBSAs with population of 500,000 or more; most appropriate scale = neighborhood.	withhold approval of that portion.	not met: withhold approval of that portion			
73.	Minimum monitoring requirements met for PM2.5	App. D 4.7.1(a)	SLAMS & NCore are min # per Table D5 unless approved by RA	Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
74.	Network Design Criteria for PM2.5: Must represent community-wide air quality: neighborhood or urban scale (note: can be micro or middle scale if RA determines they represent many such locations in the metropolitan area)	App. D 4.7.1(b)		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
75.	Is at least one site in a population-oriented area of expected maximum concentration?	App. D 4.7.1(b)(1)		Add/correct in following year's plan and withhold	If minimum monitoring requirements are not met:	Is to be sited	Y	Y

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				approval of that portion.	withhold approval of that portion			
76.	If >1 SLAMS required, is there a site in an area of poor air quality	App. D 4.7.1(b)(2)		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	Is to be sited	Y	Y
77.	Is there a requirement in this paragraph?	App. D 4.7.1(b)(3)						
78.	Do the listed scales make sense given the other site information provided?	App D 4.7.1(b)(3)(1)-(5)						
79.	Minimum monitoring requirements for continuous PM2.5 monitoring met?	App D 4.7.2	-# equal to half the required SLAMS (round up) -If required, at least on collocated with a FRM/FRM/ARM -Must use methods and QA/QC approved by EPA RA			must	Y	Y
80.	Is there at least one regional background and one regional transport site in each state? (with EPA approved methodologies and QA/QC, can be non-FEMs)	App D 4.7.3				Must	Y	Y
81.	Are PM2.5 Chemical Speciation requirements	App D 4.7.4	Continue operating sites designated as			Shall continue		

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	met for official STN sites?		STN, including the right analyses and using approved methods <u>Official sites:</u>					
82.	Spatial Averaging for comparison to Annual NAAQS: are intended CMZs defined and met criteria in 40 CFR 50 App N?	App D 4.7.5						
83.	Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
84.	Minimum monitoring requirements met for PM10-2.5 mass and speciation	App D 4.8		Add/correct in following year's plan and withhold approval of that portion.	If minimum monitoring requirements are not met: withhold approval of that portion	must	N	Y
85.	Distance of site from nearest road	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
86.	Traffic count of nearest road	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N

Comment [mk3]: Add these

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app?¹
87.	Groundcover	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
88.	Probe height	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
89.	Distance from supporting structure	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
90.	Distance from obstructions on roof	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
91.	Distance from obstructions not on roof	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
92.	Distance from trees	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
93.	Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent	N	N

	ANP requirement	Citation within 40 CFR 58	Regulation	Action if info is missing or incorrect	Action if req. is not met (assumes correct info submitted)	Notes on req.	Informs network adeq?	Critical for ANP app? ¹
						possible		
94.	Distance between collocated monitors	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
95.	Unrestricted airflow	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
96.	Probe material (if applicable)	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
97.	Residence time (if applicable)	App. E		Add/correct in following year's plan.	Suggest corrective action.	followed to the maximum extent possible	N	N
98.								
99.	Not required as part of plan but good to check							
100.	Start Date of FRM/FEM/ARM at SPM to determine 24 months and information that App A, C or E requirements were not met	58.20(c) – (e)				Need info to judge comparability to NAAQS	N	N
101								
102								

Comments

Use a weight of evidence approach.

For the letter, use some language like:

Based on the information that is in the Annual Network Plan, [EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for ...] (use R1 language: “With this letter, I am approving your Annual Network Plan, with the exception of NCore, PAMS, STN, and the NO₂ monitoring plan required under 40 CFR 58.10(a)(5). Per 40 CFR 58.11(c), your NCore, PAMS, STN, and NO₂ network design and changes are subject to approval of the Administrator.”)

Create letter for late plans requesting whether plan will be submitted or confirming that there have been no changes.

Put in some order that is useful for review.

Add items that are not requirements but good to check – at end of checklist.